

Before the  
Federal Communications Commission  
Washington, D.C. 20554

**RECEIVED**  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Access Charge Reform	)	CC Docket No. 96-262
	)	
Price Cap Performance Review for Local Exchange Carriers	)	CC Docket No. 94-1
	)	
Transport Rate Structure and Pricing	)	CC Docket No. 91-213
	)	
End User Common Line Charges	)	CC Docket No. 95-72

**UNITED STATES TELEPHONE ASSOCIATION**  
**COMMENTS ON PETITIONS FOR RECONSIDERATION**

The United States Telephone Association (USTA) respectfully submits its comments on the Petitions for Reconsideration and/or Clarification filed July 11 in the above-referenced proceeding. USTA's comments address petitions filed regarding the assessment of the multi-line business PICC, modifications of the transport rate structure, and the adoption of an unbundled SS7 rate structure.

**I. THE PICC SHOULD BE ASSESSED ON A MORE UNIFORM BASIS.**

The Commission's *Order* requires that a new Presubscribed Interexchange Carrier Charge (PICC) recover common line revenues which are not recovered from the Subscriber Line Charge (SLC) and other common line charges. The PICC is subject to ceilings of \$.53 for primary residence and single line business lines, \$1.50 for non-primary residence lines and \$2.75

for multi-line business lines.<sup>1</sup> There seems to be agreement among petitioners that a higher PICC for multi-line business lines will result in an implicit subsidy from business to residential customers.<sup>2</sup> Further, several petitioners have requested that the Commission reconsider the amount of the PICC on multi-line business lines and set the multi-line PICC at the same level as the residential PICC.<sup>3</sup>

In its comments in this proceeding, USTA strongly supported the recovery of non-traffic sensitive (NTS) costs on a fixed, per line basis. The recovery of NTS costs through the PICC does provide for a more economically rational basis for the recovery of these costs. However, USTA agrees with petitioners that the PICC be more uniformly applied to all lines, although at a level which is higher than the current primary residence PICC, in order to reduce the implicit subsidy and to lessen the uneconomic impact of the higher PICC on large business customers. For example, the Commission could assess a PICC of \$1.00 per line for all lines or implement the full level of PICCs for single line business and residential customers on January 1, 1998 thus eliminating the transition period.<sup>4</sup>

In its Petition, USTA requested reconsideration of the assessment of the PICC on Centrex lines and, instead requested that LECs be permitted to reflect a line to trunk equivalency or to

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<sup>1</sup>The Commission notes that as the PICC associated with primary residential and single-line business lines increases, the PICCs on non-primary residential and multi-line business lines will eventually be reduced. *Order* at ¶102.

<sup>2</sup>CompTel at 2-6, Call-America at 2-8, County of Los Angeles at 2-8. *See*, also comments filed June 26, 1997 in CC Docket No. 96-262 regarding the application of a PICC on special access lines.

<sup>3</sup>ACTA at 2, TRA at 5-12 and U.S. Long Distance at 2-3.

<sup>4</sup>County of Los Angeles at 9.

utilize Network Access Registers (NARs) in order to prevent a disproportionate assessment of PICCs on carriers serving Centrex customers.<sup>5</sup> Centrex customers pay a SLC on each line which recovers the full cost of the common line used to provide the service. Since the PICCs are not related to the costs incurred to provide service for multi-line business customers, including Centrex customers, the assessment of the PICCs on Centrex lines on a per line basis will force Centrex customers to pay far more than similarly-sized PBX customers.

Two other parties support USTA's position. In its Petition, ICA states, "the application of the SLC and PICC charges to Centrex systems seriously undermines the viability of Centrex systems and basically ensures that they will no longer be a competitive alternative for business customers...The Commission's decision to disproportionately apply PICCs to Centrex systems disadvantages the competitiveness of Centrex systems."<sup>6</sup>

In its Petition, the County of Los Angeles calculates the impact of the PICC on the rates it will be charged and agrees that the problem of the higher multi-line business PICC will be exacerbated for Centrex users because of the substantially greater number of access lines upon which the new charge will apply.<sup>7</sup> It notes that Centrex is a particularly efficient local serving arrangement for entities with numerous geographically dispersed premises, such as local, state, and the Federal governments. "The imposition of the multiline PICC at \$2.75 per Centrex line has the potential to dramatically distort the procurement process for purchasers of both local and

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<sup>5</sup>USTA at 2-4.

<sup>6</sup>ICA at 3.

<sup>7</sup>County of Los Angeles at 6.

long distance service. These charges may improperly incent large users to choose a PBX solution over an otherwise preferable Centrex system. And with respect to long distance service, local governments will be pariahs to be avoided by the IXC's at all costs."<sup>8</sup> The County of Los Angeles requests that the Commission apply the PICC to Centrex lines on a PBX trunk equivalency rather than a per line basis.<sup>9</sup>

USTA's Petition also requested a delay in the imposition of the PICC on non-primary residential lines until one year after the Commission adopts a definition of non-primary lines.<sup>10</sup> As USTA pointed out, the PICC cannot be applied until non-primary lines are defined. In its Petition, Sprint describes some of the difficulties involved in identifying such lines and some of the issues which must be resolved in order to apply the PICC to non-primary lines.<sup>11</sup> However, Sprint's suggestion that LECs provide customer-by-customer PICC data is unduly burdensome and unnecessary and should not be adopted.

Finally, Sprint also points out that Section 69.152 of the rules adopted in the *Order* specifies that SLCs are calculated by dividing projected revenues by projected subscriber line counts while Section 69.153 states that the PICCs are to be calculated by dividing base period revenues by projected loop counts.<sup>12</sup> The PICC calculation relies on a mismatch of the time periods used to calculate the charges.

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<sup>8</sup>*Id.*

<sup>9</sup>*Id.* at 10.

<sup>10</sup>USTA at 4-5.

<sup>11</sup>Sprint at 3-5.

<sup>12</sup>*Id.* at 6.

Historically, loop counts have been increasing. Using base period revenues in conjunction with projected demand would understate the PICCs as the PICC will not recover the growth in loop costs. This mismatch will ultimately result in an increased MOU charge since as the PICC declines, more costs will have to be recovered through usage charges. In order to ensure that the demand amounts are properly matched with the year in which the revenues are incurred, USTA concurs with Sprint that the Commission should use base period demand and revenues for purposes of calculating the SLC and the PICC.

Producing forecasted data has always been problematic. The consistent use of base period demand would eliminate these problems, facilitate consistent results and reduce administrative burdens.

## **II. THE COMMISSION SHOULD NOT RECONSIDER THE ELIMINATION OF THE UNITARY TRANSPORT RATE STRUCTURE.**

While several petitioners request that the Commission reconsider its decision to abolish the unitary transport rate structure,<sup>13</sup> USTA supports the Commission's decision to implement a cost-based rate structure for tandem-switched transport. The Commission is correct in its assessment of the interim, unitary rate structure in that it does not accurately reflect the manner in which LECs incur costs in providing tandem-switched transport and, thus, does not provide sufficient incentives for IXC's to utilize transport facilities efficiently.<sup>14</sup> Further, as the Commission explains, by bundling the dedicated and common portions of the transmission component of tandem-switched transport into a single, end-to-end per-minute charge, the unitary

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<sup>13</sup>CompTel at 15, and EXCELL at 6.

<sup>14</sup>Order at ¶¶ 178-180.

rate structure inhibits the development of competition. Finally, the Commission appropriately found that the unitary rate structure may not promote “full and fair” interexchange competition.

CompTel also asserts that the new transport rate structure will discriminate against tandem switched transport customers in favor of direct trunked transport customers when both use the same facilities.<sup>15</sup> However, in the *Order*, the Commission appropriately points out that the transmission component of tandem-switched transport is not, in fact, provisioned by the incumbent LEC on an end-to-end basis.<sup>16</sup> Purchasers of direct-trunked transport purchase an end-to-end service: transport capacity between two end points. Tandem-switched transport customers, in contrast, purchase use of the tandem switch to route traffic to their point of presence. By virtue of their decision to choose tandem-switched transport, these customers specifically obligate the LEC to transport their traffic between the serving wire center and the tandem serving a particular end office or group of end offices and to perform the tandem switching function. The incumbent LEC incurs the costs of transmitting their traffic between the serving wire center and the tandem on trunks which are dedicated to the customer and the customer determines the quantities of the trunks. Thus, tandem-switched transport customers should pay the costs of reaching the tandem. This is not a matter of discrimination, rather, it is a matter of following the principle of cost-causation.

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<sup>15</sup>CompTel at 18.

<sup>16</sup>*Order* at ¶ 182.

CompTel also requests that the Commission continue to use the 9000 minutes of use loading factor.<sup>17</sup> The Commission correctly found that this was no longer reasonable.<sup>18</sup> The Commission notes that this figure is based on data which was collected almost fifteen years ago and overstates actual traffic levels. In fact, some incumbent LECs indicate that their actual traffic levels may be as low as 4,000 minutes of use per month per voice grade circuit. The Commission need not reconsider this issue.

In its petition, Sprint argues that the three-part rate structure will create incentives for LECs to engage in inefficient network reconfiguration, placing tandems far from end offices and serving wire centers simply to increase tandem-switched transport revenues.<sup>19</sup> However, the Commission found, based on its examination of the record, that such incentives did not exist.<sup>20</sup> The Commission found that such practices would be costly and impractical.

Finally, TCG and AT&T request that the exemption of the Transport Interconnection Charge (TIC) on competitive access provider (CAP) transport occur immediately.<sup>21</sup> This request should not be adopted. As USTA documented in the record, the TIC represents legitimate, actual costs which have been assigned to the interstate jurisdiction and to the transport category through the correct application of the Commission's rules. Incumbent LECs are entitled to the full and complete recovery of the entire TIC amount. In the *Order*, the Commission appropriately

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<sup>17</sup>CompTel at 23.

<sup>18</sup>*Order* at ¶ 206.

<sup>19</sup>Sprint at 8.

<sup>20</sup>*Order* at ¶ 183.

<sup>21</sup>TCG at 2 and AT&T at 10.

transfers the service-related portions of the TIC to the appropriate elements in order to better reflect how these costs are incurred. However, there is no basis in the record to justify the exemption from the per-minute residual TIC for traffic that is carried on CAP transport, much less to expedite the exemption.<sup>22</sup> The requests of TCG and AT&T should be denied.

### **III. INCUMBENT LECS SHOULD BE AFFORDED THE FLEXIBILITY TO RECOVER THE COSTS OF SS7 SIGNALING.**

Worldcom seeks reconsideration of the recovery of SS7 signaling costs adopted in the *Order*.<sup>23</sup> Worldcom's request should be denied. The Commission should adhere to the principle of cost causation by permitting incumbent LECs the flexibility to recover costs from customers utilizing the LEC SS7 networks. In the case of the costs of SS7 signaling, interexchange carriers recover their costs from their customers and the LECs should be permitted to recover their costs from their customers, the IXC's, through the adoption of an unbundled signaling rate structure which best meets their needs as determined in the *Order*.<sup>24</sup> An unbundled rate structure appropriately identifies the cost causers and ensures that the recovery of costs is equitable. There is no double recovery of these costs through charges for vertical services, as suggested by Worldcom. SS7 network costs are individually identified and support SS7 rate structures.

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<sup>22</sup>See, NYNEX Petition for Stay Pending Judicial Review, CC Docket No. 96-262, July 23, 1997.

<sup>23</sup>Worldcom at 21-22.

<sup>24</sup>*Order* at ¶ 253.



CompTel argues that it is difficult to verify charges under the unbundled SS7 rate structure which was approved in the *Ameritech SS7 Waiver Order*.<sup>25</sup> If any billing system adjustments are required, the incumbent LECs will have adequate time to do so. IXC's that seek the ability to verify the accuracy of rate element charges may purchase measurement equipment.

Two petitioners request a delay in the implementation of signaling call set up charges.<sup>26</sup> The *Order* simply permits the LECs to transfer the costs of signaling call setup from the TIC and Local Switching to a new rate structure. LECs will continue to charge their IXC customers for these costs. There is no reason to delay the implementation of call set up charges.

#### **IV. CONCLUSION.**

USTA urges the Commission to act on the Petitions for Reconsideration as discussed above.

Respectfully submitted,

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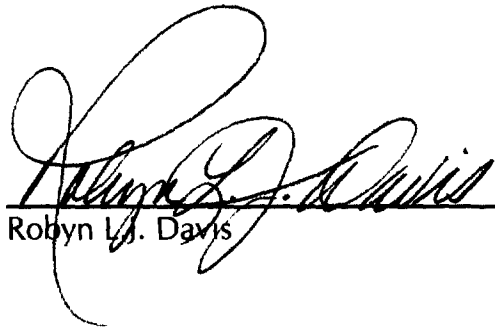
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<sup>25</sup>CompTel at 24-25.

<sup>26</sup>Ad Hoc at 4, CompuServe at 1.

**CERTIFICATE OF SERVICE**

I, Robyn L.J. Davis, do certify that on August 18, 1997 Comments on Petitions for Reconsideration of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.



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